

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Case No. 19-cr-10335-DJC
)	
TANMAYA KABRA,)	FILED UNDER SEAL
Defendant.)	
)	
_____)	

**GOVERNMENT’S ASSENTED-TO MOTION FOR LEAVE TO FILE UNDER SEAL
ITS MOTION FOR AN ORDER OF RESTITUTION**

Pursuant to Local Rule 7.2, the Government requests the Court’s permission to file under seal its Motion for An Order of Restitution.

As grounds for this motion, the Government states as follows:

1. On April 8, 2019, defendant Tanmaya Kabra pled guilty to four counts of wire fraud in violation of 18 U.S.C. § 1343. The Mandatory Victim Restitution Act of 1996 (“MVRA”) requires that a defendant convicted of any crimes involving fraud or deceit make restitution to any victim of that offense. 18 U.S.C. §§ 3663A(a)(1), (c)(1)(A)(ii).

2. Consistent with the MVRA, the Government intends to move this Court for an order requiring Kabra to make restitution to his victims. The Government anticipates that its motion will identify Kabra’s victims by name, refer to the amount of their losses, and otherwise describe and identify them.

3. Under the Crime Victim Rights Act, Kabra’s victims have the right to be treated with respect for their dignity and privacy. 18 U.S.C. § 3771(a)(8). Accordingly, to protect the privacy of Kabra’s victims, the Government requests leave to file its motion for restitution and

the exhibits thereto under seal. If this motion is granted, the Government will file a redacted version on the public docket removing victim-identifying information.

4. Counsel for Kabra has informed the Government that he assents to the Government's request for leave to file its motion for restitution under seal.

WHEREFORE, the Government respectfully requests that the Court grant this Motion for leave to file its motion for restitution under seal.

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

NATHANIEL R. MENDELL
Acting United States Attorney

/s/ Christopher Looney
Christopher Looney
James D. Herbert
Assistant U.S. Attorneys
1 Courthouse Way, Suite 9200
Boston, MA 02210
617.748.3100

Dated: August 19, 2021

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorney

Dated: August 19, 2021